Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	FCC 07-70
	)	
The Third Periodic Review of the	)	MB Docket No. 07-91
Commission's Rules and Policies	)	
Affecting the Conversion	)	
To Digital Television	)	

INDEPENDENT MULTIFAMILY COMMUNICATIONS COUNCIL (IMCC)

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Late Filed Comments

IMCC is a trade association that represents Private Cable Operators (PCOs), also referred to as Satellite Master Antenna Television providers (SMATV), program distributors, manufacturers and vendors that provide hardware and software to the PCOs and Multiple Dwelling Unit (MDU) owners and managers. PCOs provide to MDU residents analog and digital television, high-speed data connectivity and, in some cases, different forms of telephonic communications.

The proceeding before the Commission is important to IMCC and its members. We find the issues at hand both difficult to decipher and challenging for PCOs since it is the intention of PCOs to provide PCO subscribers with the best service possible. In short, our industry will decipher the complex issues at hand and will make every effort to make sure all PCO subscribers are provided with quality television that meets all standards and requirements established by the Federal government.

Since the announcement by the Commission that the analog broadcasts would eventually be terminated and the spectrum that they occupied would be relinquished, all MVPDs, including PCOs, have been refining their strategies to manage the event so the outcome will not have any negative impact on subscribers.

Most PCOs are providing local broadcast content by one, some, or all of the following methods:

1. A satellite delivered “local broadcast package” via an affiliate agreement with either Dish or DirecTV provided to each viewing location via the satellite receiver for that viewing location.
2. A local digital broadcast package via a digital headend signal processor. That is one for each local digital broadcast and each processor output rebroadcast on the building RF network.
3. A local broadcast package in analog format either (a) via a multiplicity of satellite receivers, each followed by an analog RF modulator for each program, the modulator outputs combined and then onto a single cable and rebroadcast on the MDU building RF network; or (b) a multiplicity of analog processors, one for each local analog broadcast, the modulator outputs then combined onto a single cable and rebroadcast on the MDU building RF network.

The following discusses the impact of the local analog transmitter broadcasts being terminated with respect to each of the above:

1. In the situation where the local broadcasts are provided at each individual viewing location via the satellite receiver for that location, there would be no negative impact. The viewers will continue to receive the local broadcasts uninterrupted.
2. In the case where the local digital broadcasts are provided via headend digital signal processors, the viewers must already have purchased ATSC digital broadcast receiving equipment to view those broadcasts. Therefore, when the local analog broadcasts are terminated, the viewers will continue to receive the local broadcasts uninterrupted.

3(a). In the case where a local broadcast package is provided to the viewer in analog format, the source of each program being via a satellite receiver at the headend followed by an RF modulator, the viewers will continue to receive the local broadcasts uninterrupted.

The foregoing scenarios, 1, 2 and 3, cover the majority of PCO MVPD based systems and subscribers.

However, with respect to scenario 3 (b), where the local broadcasts are provided in analog format and the source of each program is the local analog broadcast, unless action is taken by the PCO operator prior to the termination of such broadcasts, upon termination viewers in that situation will no longer be able to view the locally broadcast programs. There are at least two simple solutions to this.

1. The PCO, system operator, could replace each headend analog signal processor with a new product, a digital to analog processor (DAP). A DAP receives the local digital broadcast and provides at the output, the primary program in analog format on the same RF channel as the replaced analog processor previously provided it. It is probable that the antenna and receiving components that provide the signal to the headend will also have to be re-crafted to accommodate the digital broadcasts, all of which will be at different frequency assignments from the original analog broadcast frequency assignments. When this approach is taken, the individual viewing locations will not need a D/A box, or a new viewing location wiring scheme.
2. An alternate approach would be to replace each headend analog processor with a digital processor (DHDP). In this case, the receiving antennas and signal feeds to the headend will have to be re-crafted as in the foregoing, and, in addition, each viewing location will have to be upgraded to receive and display the programs that will now be delivered in digital format, rather than analog format. This must be

accomplished by either installing a D/A converter box or upgrading the TV to a digitally capable TV.

Summary

There are many PCO facilities. The great majority of these are owned and operated by responsible operators that operate in a professional manner. They have paying subscribers, with high service level expectations. Most, if not all are following one (or more) of the system approaches set out in 1-3 (a). However, we admit that there exist many MDU networks employing the system approach in 3 (b). These are generally provided and owned by the MDU building owner or the condominium or planned unit development home owners association (HOA). We agree that a campaign to inform them via, at a minimum, a series of PSAs is necessary. In addition, information could be distributed through the associations that represent those entities. Magazines that have as their readership MDU/REIT/HOA representatives could also serve as a conduit for such communication. In many cases, the parties that are responsible for these systems are unaware that if a system upgrade is not addressed very soon, the viewers will lose access to the locally broadcast programs.

IMCC has already repeatedly informed its PCO membership of their responsibilities.

In addition, the question has been raised “will the D/A box, for which coupons will be distributed, work on the PCO networks”. The answer is yes, for all systems that employ the approach set out in #2 or the approach set out in the solution for #3 (b) (which is the same as #2). With respect to approach #1, which uses a satellite receiver at each viewing location to provide the local programs, and approach #3(a), which uses digital to analog processors at the headend to formulate an analog line-up of local broadcasts, the D/A box would be extraneous and not required.

If needed, IMCC will be pleased to address other questions pertinent to the Commission.

Respectfully submitted,

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